

Gentlemen,

In his petition, RM-10620, Dale Reich, K8AD, has asked the Commission to automatically upgrade Novice and Advanced license holders to the next license class if the licensee has 20 or more years of operating experience. Among other proposed changes in his ''merit and service upgrade'' schedule, Reich asks that Novice phone privileges in the 2-meter band be reinstated for those still holding that license for twenty years.

After twenty years of operating a Novice or Advanced class licensee should have learned enough to upgrade and be able to pass an additional test on Amateur Radio.

If the licensee was inactive during that twenty-year period, an upgrade test should be required so that the licensee could become proficient with new technology, rules, and operating procedures. In either scenario, there is no logical reason to exclude licensees from upgrade testing in exchange for "time credits." The duration of holding a license does not necessarily demonstrate proficiency or understanding of operating techniques, rules and theory required for the higher-class license. Its possible the twenty year license holders know less today about operating procedures, technology and regulations than they did when they were first licensed.

If these operators are needed for public service eg. RACES, ARES, this all the more reason to require additional testing to upgrade. Emergency communications operators are the most prominent in public view and high-level communications proficiency is critical because of the importance of the messages. Emergency operators should not be grand fathered into spectrum use but more intensively trained and tested.

Approval of this petition would further dilute the requirements for Amateur Radio Licensees and emergency communication volunteers.

Respectfully submitted,

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